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January 30, 2025

VIA ECF

Hon. J. Paul Oetken
United States District Court for the
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

**Re: *Jonathan Lowenstein v WIP ECOM, LLC, et al.*, Case No. 1:24-cv-07562-JPO
Stipulated Motion to Extend Time to Respond to Amended Complaint**

Dear Judge Oetken,

This firm represents Defendants WIP ECOM, LLC d/b/a Carhartt Work in Progress (WIP), Carhartt Retail LLC, and Carhartt, Inc. (collectively, “Defendants”) in the above-referenced action. In accordance with Your Honor’s Individual Rules, paragraph 3(C), Defendants respectfully request a thirty (30) day extension of time to answer, move, or otherwise respond to Plaintiff’s Amended Complaint, making the new deadline March 5, 2025. Plaintiff’s counsel has consented to this request.

Based on the ostensible service date of the Summons, the original due date for Defendants to respond to the Amended Complaint is February 3, 2025. This request is being filed today as the undersigned attorney was only recently retained by Defendants in this action. This is Defendants’ first request to extend the deadline to answer or otherwise respond to the Amended Complaint. The date for the parties’ next scheduled appearance before the Court is March 4, 2025, at 2:30 PM.

This request is not sought for any improper purpose and would not affect any other scheduled dates. Defendants’ request for additional time to respond to the Amended Complaint is not intended to cause undue delay.

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Respectfully submitted,

/s/ Andrew J. Ligotti

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